

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALASKA VILLAGE ELECTRIC
COOPERATIVE, INC., an Alaska
corporation,

Plaintiff,

v.

ZURICH AMERICAN INSURANCE
COMPANY, a New York corporation;
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
THROUGH CHARTIS GLOBAL MARINE,
a Pennsylvania corporation; NATIONAL
CASUALTY COMPANY, a Wisconsin
corporation; GREAT AMERICAN
INSURANCE COMPANY OF NEW YORK,
a New York corporation; and STARR
INDEMNITY & LIABILITY COMPANY, a
Texas corporation,

Defendants.

IN ADMIRALTY AND AT LAW

Lead Case No. 2:11-cv-01375-RAJ

Member Case No. 2:11-cv-01819-RAJ

DECLARATION OF PETER WISWELL

NOTE ON MOTION CALENDAR:

August 1, 2014

I, Peter Wiswell, declare as follows:

1. I make this declaration of and from my own first-hand knowledge and based upon
a review of records assembled at my direction at Zurich North America.

2. I am the ocean marine claims manager for Zurich American Insurance Company.
I have been following this case with our outside counsel since it was first asserted in the
summer of 2011.

DECLARATION OF PETER WISWELL: Lead Case
No. 2:11-cv-01375 - 1

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1 3. Based on my review of the records, Zurich has retained Bauer Moynihan &
2 Johnson to act as defense counsel on four separate third-party liability matters between 2008
3 and 2013, and over that period, Zurich has paid Bauer Moynihan & Johnson just over
4 \$66,000 in fees for these retentions.

5 I declare under penalty of perjury under the laws of the State of Washington that the
6 foregoing declaration is true and correct.

7 Dated this 17 day of July, 2014.

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9 _____
10 Peter Wiswell
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DECLARATION OF PETER WISWELL: Lead Case
No. 2:11-cv-01375 - 2

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2014, I caused to be served the foregoing DECLARATION OF PETER WISWELL on the following parties via United States District Court – Western District of Washington’s Electronic Case Filing System (“ECF”) at the following addresses:

- **Claire L. Rootjes**
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By: /s/ Claire L. Rootjes
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Zurich American Insurance Company,
National Union Fire Insurance Company
of Pittsburgh, PA, through Chartis
Global Marine, National Casualty
Company, Great American Insurance
Company of New York, and Starr
Indemnity & Liability Company

CERTIFICATE OF SERVICE - 1
CASE NO. 2:11-CV-01375-RAJ AND CASE NO. 2:11-CV-01819-RAJ

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